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[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Master File No. 3:07-md-1827 SI
MDL No. 1827

This Document Relates to Individual
Case No. 3:10-cv-04945-SI

TARGET CORP., *et al.*,

Plaintiffs,

v.

AU Optronics Corporation, *et al.*,

Defendants.

**STIPULATION AND [PROPOSED]
ORDER REGARDING SERVICE AND
SCHEDULING**

WHEREAS the undersigned counsel, on behalf of their respective clients, plaintiffs Target Corp., Sears, Roebuck and Co., Kmart Corp., Old Comp Inc., Good Guys, Inc., RadioShack Corp., and Newegg Inc. (collectively, "Plaintiffs") filed a complaint in the above-captioned case against AU Optronics Corporation; AU Optronics Corporation America; Chi Mei Corporation; Chimei Innolux Corporation (*f/k/a* Chi Mei Optoelectronics Corporation); Chi Mei Optoelectronics USA, Inc.; CMO Japan Co., Ltd.; Nexgen Mediatech Inc.; Nexgen Mediatech USA, Inc.; Epson

1 Imaging Devices Corporation; Epson Electronics America, Inc.; LG Display Co., Ltd.; LG Display
2 America, Inc.; Samsung Electronics Co., Ltd.; Samsung Semiconductor, Inc.; Samsung Electronics
3 America, Inc.; Sharp Corporation; Sharp Electronics Corporation; Toshiba Corporation; Toshiba
4 America Electronic Components, Inc.; Toshiba Mobile Display Co., Ltd.; and Toshiba America
5 Information Systems, Inc. (collectively, "Stipulating Defendants"), on November 1, 2010
6 ("Complaint");

7 WHEREAS Plaintiffs wish to avoid the burden and expense of serving process on the
8 Stipulating Defendants;

9 WHEREAS the Stipulating Defendants desire a reasonable amount of time to respond
10 to the Complaint;

11 WHEREAS Plaintiffs and the Stipulating Defendants believe that proceeding on a
12 unified response date will create efficiency for the Court and the parties by reducing duplicative
13 motion practice;

14 THEREFORE, Plaintiffs and the Stipulating Defendants hereby agree:

15 1. The Stipulating Defendants waive service of the Complaint under Federal Rule of
16 Civil Procedure 4(d). This stipulation does not constitute a waiver by the Stipulating Defendants of
17 any other substantive or procedural defense, including but not limited to the defense of lack of
18 personal or subject matter jurisdiction and improper venue.

19 2. The Stipulating Defendants' deadline to move to dismiss, answer, or otherwise
20 respond to the Complaint will be 90 days from the execution of this stipulation.

21 DATED: January 27, 2011

22 CROWELL & MORNING LLP

23 By: /s/ Jason C. Murray

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Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from Jason C. Murray, Christopher A. Nedeau, Jeremy J. Calsyn, John M. Grenfell, Stephen P. Freccero, Simon J. Frankel, and John H. Chung.

1 **[PROPOSED] ORDER**

2 Pursuant to the stipulation of the parties, IT IS SO ORDERED.

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5 Dated: _____

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8 The Honorable Susan Illston
9 United States District Judge
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